

SHER TREMONTE LLP

February 12, 2024

BY ECF

Honorable Sarah L. Cave
United States Magistrate Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *Bennett v. Cuomo, et al.*, No. 22 Civ. 7846 (VSB) (SLC)

Dear Judge Cave:

Pursuant to the Court's Order dated February 6, 2024, counsel for Governor Cuomo, Melissa DeRosa, and Lindsey Boylan jointly write to provide the Court with an update on the status of the search term negotiations concerning Ms. Boylan's forthcoming production. All parties have exchanged proposed terms. While we have not come to a resolution, we plan to further meet and confer to discuss the proposed terms this week. Consistent with the Court's February 1, 2024 Order (ECF No. 182), counsel for Governor Cuomo will include in his letter due to the Court on February 20, 2024 an update on the status of Ms. Boylan's compliance with the subpoenas at issue.

We appreciate the Court's attention.

Respectfully submitted,

/s/ Theresa Trzaskoma

Theresa Trzaskoma